

Approved:   
LINDSEY KEENAN  
Assistant United States Attorney

Before: HONORABLE SARAH NETBURN  
United States Magistrate Judge  
Southern District of New York

**22 MAG 5029**

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	:	<u><b>SEALED COMPLAINT</b></u>
UNITED STATES OF AMERICA	:	
- v. -	:	Violation of
	:	18 U.S.C. §§ 249(a)(1)(A)
SAADAH MASOUD,	:	and 2
	:	
Defendant.	:	COUNTY OF OFFENSE:
	:	NEW YORK
- - - - -	x	

SOUTHERN DISTRICT OF NEW YORK, ss.:

LAVALE JACKSON, being duly sworn, deposes and says that he is a Special Agent with the United States Attorney's Office for the Southern District of New York ("USAO-SDNY"), and charges as follows:

COUNT ONE  
(Hate Crime Act)

1. On or about April 20, 2022, in the Southern District of New York, SAADAH MASOUD, the defendant, did willfully cause bodily injury to a victim ("Victim-1") because of Victim-1's actual and perceived national origin, and actual and perceived religion, to wit, MASOUD repeatedly punched Victim-1, and dragged Victim-1 across a sidewalk, while Victim-1 was wearing an Israeli flag, causing injury to Victim-1, including a concussion.

(Title 18, United States Code, Sections 249(a)(1)(A) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with the USAO-SDNY, and I have been involved in the investigation of the above-described offense. The information contained in this Complaint is based upon my personal knowledge and participation in this investigation, as

well as on my conversations with other law enforcement agents and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my participation in this investigation, including my conversations with other law enforcement agents and my review of reports and records, I have learned the following, in substance and in part:

a. On or about April 20, 2022, officers with the New York City Police Department ("NYPD") responded to the vicinity of 42nd Street and Lexington Avenue in midtown Manhattan.

b. While on scene, NYPD officers spoke with Victim-1, who stated, in substance and in part, that an unknown assailant had followed him from a nearby pro-Palestine protest (the "Protest"), struck him repeatedly in the left side of the face, knocked him to the ground, and kicked him.

c. Victim-1 further stated, in substance and in part, that Victim-1 was wearing an Israeli flag at the Protest, and when he left the Protest, the assailant followed him, stating, "I have something for you, wait until we are in private," and "this is what happens when you're a terrorist."

4. As part of this investigation, on or about May 4, 2022, I participated in an interview of Victim-1. Based on my conversation with Victim-1, I have learned the following, in substance and in part:

a. Victim-1 is Jewish, and lived in Israel for a period of time.

b. Victim-1 attended the Protest on or about April 20, 2022. Victim-1 walked alongside the Protest wearing a large Israeli flag tied around his neck and draped down his back.

c. During the Protest, Victim-1 made eye contact with the assailant, and feeling uncomfortable, began to separate himself from the protestors by walking west on 42nd Street.

d. The assailant followed Victim-1 down the street, eventually punching him, throwing him to the ground, and tearing the Israeli flag away from Victim-1.

e. Following the assault, Victim-1's face was swollen and bruised, and Victim-1 received medical treatment at a hospital, where he was diagnosed with a concussion.

f. The assault of Victim-1 was publicized on social media, and Victim-1 received numerous messages from other individuals. Among other things, Victim-1 was sent a photograph of the assailant that had been taken by another protestor (the "Photograph"), and the name of the assailant, SAADAH MASOUD, the defendant.

g. Victim-1 provided the Photograph and MASOUD's name to an NYPD officer. That officer prepared a photo array, which included a photograph of MASOUD and five other individuals.<sup>1</sup> A different officer showed Victim-1 the photo array, and Victim-1 identified the photograph of MASOUD as the assailant who had assaulted him.

5. Based on my review of video surveillance from April 20, 2022, that was collected from a traffic camera on the southeast corner of 42nd Street and Lexington Avenue, I have learned the following, among other things:

a. At approximately 6:16 p.m., Victim-1 approaches the corner of 42nd Street and Lexington Avenue while carrying crutches. Victim-1 is being followed by a woman, and the assailant, who, based on my involvement in this investigation, I believe to be SAADAH MASOUD, the defendant. MASOUD is carrying a flag.

b. MASOUD approaches Victim-1, grabs Victim-1 by the shoulder, and throws Victim-1 to the ground. The woman behind Victim-1 falls down to the sidewalk alongside Victim-1.

c. MASOUD abandons his flag, and begins striking Victim-1 on the head and the face, while shoving away bystanders who attempt to intervene.

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<sup>1</sup> The photograph of SADA AH MASOUD, the defendant, that was included in the photo array was different than the Photograph of MASOUD that Victim-1 had received from an individual after the assault.

d. MASOUD continues striking Victim-1 for nearly twenty seconds, and also drags Victim-1 face-first across the sidewalk.

e. Ultimately, MASOUD rips the Israeli flag from Victim-1's neck, and flees east-bound on 42nd Street.

6. Based on my review of records provided by Instagram, I have learned that the listed subscriber of the Instagram account with the handle @red\_lion\_kingg is SAADAH MASOUD, the defendant. I have compared photographs of the individual depicted in the @red\_lion\_kingg Instagram account with photographs of MASOUD, and I believe they are the same person.

7. Based on my review of images posted by the Instagram account that is associated with an organization that publicly fights against antisemitism (the "Account"), I have learned that the Account published images of Victim-1's injuries following the April 20, 2022 assault, and also published an image of SAADAH MASOUD, the defendant, which identified MASOUD by name. Subsequently, the Account posted a direct message received from @red\_lion\_kingg - i.e., MASOUD's account - which stated, among other things, "I wish I could show you the things I do to Zionist but I can't post them," "Just keep watching my stories I'm going to keep violating you dirty zionist," and "I feel bad for you zionist people when judgment day comes and we slaughter all of them like sheep."

8. Based on my review of law enforcement reports, my conversations with other law enforcement agents, and my review of surveillance video, I have further learned that, in or around 2021, SAADAH MOUSAD, the defendant, participated in at least two additional violent attacks in New York, in which MASOUD targeted Jewish people. Specifically, in or around June 2021, MASOUD and a co-conspirator approached a Jewish community leader ("Victim-2") outside of Victim-2's residence in Brooklyn, New York, threatened Victim-2 by stating, in substance and in part and among other things, "we know where you live, we will get you," and proceeded to strike Victim-2 twice in the head and body. The following month, in or around July 2021, MASOUD approached another individual ("Victim-3"), who was carrying an Israeli flag in Brooklyn, New York, struck Victim-3 in the face, causing a laceration, and then stole Victim-3's Israeli flag.


WHEREFORE, I respectfully request that a warrant be issued for the arrest of SAADAH MASOUD, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.

/s authorized electronic signature

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LAVALE JACKSON  
Special Agent  
United States Attorney's Office  
Southern District of New York

Sworn to before me this  
10th day of June 2022.



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THE HONORABLE SARAH NETBURN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK